

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP., SMARTMATIC
INTERNATIONAL HOLDING B.V. and SGO
CORPORATION LIMITED,

Plaintiffs,

v.

MICHAEL J. LINDELL and MY PILLOW, INC.,

Defendants.

Case No. 22-cv-00098- WMW-JFD

DEFENDANTS' MEET AND CONFER STATEMENT

I, Abraham S. Kaplan, am one of the attorneys representing Defendants in the above-captioned matter. On August 7, 2023, and again on August 14, 2023, I held telephonic meet and confer calls with Plaintiffs' counsel on outstanding discovery issues relating to Defendant's Third Motion to Compel. The issues were not resolved on those calls.

On September 18 and 19, 2023, I sent detailed correspondence to Plaintiffs' counsel raising these and additional discovery-related issues, and included demands that they supplement their discovery accordingly. Plaintiffs have not sent further correspondence responding to these demands and the issues, covered in this Motion, remain unresolved.

I had three separate calls with Plaintiffs' counsel in the month of September regarding Defendants' motion to amend the second amended scheduling order. Counsel for the parties were unable to resolve the issues, necessitating this Motion.

DATED: September 27, 2023

PARKER DANIELS KIBORT LLC

By /s/ Abraham S. Kaplan

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